

EXHIBIT A

Ragnvald Mjanger

Reliance List
in Addition to Materials Referenced in Report

Medical Literature

Agostini A, et al. [Pop 12,280] Immediate complications of tension-free vaginal tape (TVT): results of a French survey. <i>Eur J Obstet Gynecol</i> . 2006; 124:237-239.
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Production Materials

Document Description [Bates Range]
A Solution-Gynecare TVT Tension-Free Support for Incontinence.
DEPO.ETH.MESH.00004755 - Guidoin Explant
DX23600-R.1-3 - Prolene Resin Manufacturing Specifications 1.23.03
Email string re - Revised write up of the DeLeval and Waltregny visit
ETH.MESH.00071794 - Email re: TVT IFUs on tape extrusion, exposure and erosion
ETH.MESH.00220335-36 - 12.2.1999 Memo re: Biocompatibility Risk Assessment for Soft Prolene Mesh.
ETH.MESH.00262015-016 - Dan Smith Email Plaintiffs Exhibit 2067
ETH.MESH.00349228 - Cytotoxicity Risk Assessment for the TVT (Ulmsten) Device
ETH.MESH.00373310 - Gynecare TVT Tension-Free Support for Incontinence: General Profession Education Deck.
ETH.MESH.00523942 - Waltregny 2005 ICS Presentation
ETH.MESH.00526473-74 - Allison Brown Email re-Laser-cut Mesh
ETH.MESH.00541379-80 - Mesh Fraying for TVT Devices
ETH.MESH.00575257 - Abbrevio laser cut vs. mechanically cut - notes from meeting with de leval - inappropriate
ETH.MESH.00575270-273 - Jean de Leval Email Re: DSCN3332.JPG May 30, 2009
ETH.MESH.00584811-13 - Email string re-Ultrasonic Slitting of Prolene Mesh for TVT
ETH.MESH.00590896-897 - Piet Hinoul Email 3.11.09
ETH.MESH.00658177-198 - Surgeons Resource Monograph
ETH.MESH.00687819-22 - Email string re-Laser cut mesh
ETH.MESH.00857821 - Top Ten Reason to pursue Gynecare TVT Obturator System
ETH.MESH.00858080-081 - Perry Trial - Plaintiff's Exhibit 2313
ETH.MESH.00858096-97 - Gynecare R&D Monthly Update - May
ETH.MESH.00858175-176 - Mulberry Weekly Meeting MINUTES for 6.3.03
ETH.MESH.00858252-53 - 2004 Memo from London Brown to Dan Smith re Mechanical Cut vs. Laser Cut Mesh Rationale
ETH.MESH.00863391 - T-366 - Dan Smith email - particle loss
ETH.MESH.00870466 - Ethicon Expert Meeting-Meshes for Pelvic floor
ETH.MESH.00993273 - TVT Obturator Anatomic Considerations Clinical Update: Special Considerations, Complications.
ETH.MESH.01202189 - Stale Kvitle Email regarding Mini Me follow up from our visit May 20, 2009
ETH.MESH.01202190-191 - David Waltregny Email Re: Mini Me follow up from our visit May 21, 2009
ETH.MESH.01203957-97 - The future of surgical meshes-the industry's perspective
ETH.MESH.01219542-48 - Review of Surgeon Responses of VOC Questionnaire
ETH.MESH.01220135-45 - Email string re-New Standards for Urethral Slings
ETH.MESH.01228079-84 - Nilsson Podcast Transcript
ETH.MESH.01238454-56 - Email string re-TVTO length
ETH.MESH.01279975-976 - Harel Gadot Email re Next step in SUI sling
ETH.MESH.01317508-613 - TVT Factbook DHF - Revised 05.14.2001
ETH.MESH.01752532-35 - Mesh design argumentation issues
ETH.MESH.01784823-28 - Clinical Expert report-Laser Cut Mesh
ETH.MESH.01785259-260 - Email string re: +M relaxation
ETH.MESH.01808311-318 - Trip Report Michael Tracey
ETH.MESH.01809082-83 - Memo re: VOC on new laser cut TVT mesh
ETH.MESH.01813259; ETH.MESH.02180759-61 - Email string with attachment re-Jeans Ideas.
ETH.MESH.01813975-78 - Email string re-FDA Prep-Plaintiff's Exhibit 460

Production Materials

ETH.MESH.01822361-363 - Dan Smith Email regarding TVT Secur October 18, 2006
ETH.MESH.01822361-62 - Dan Smith Email regarding TVT-Secur leading to less retention
ETH.MESH.02017152-56 - 02.23.2007 Ethicon Expert Meeting: Meshes for Pelvic Floor Repair
ETH.MESH.02026591-95 - MSDS-c4001 Polypropylene Homopolymer
ETH.MESH.02090196-209 - Plaintiff's Exhibit 4085-04.15.2008
ETH.MESH.02211890 - Test Report
ETH.MESH.02319312 - Memo re-TVT-base & TVT-O Complaint Review for Laser Cut Mesh Risk Analysis
ETH.MESH.02340331-335 - TVT IFU (12.22.03 to 02.11.05)
ETH.MESH.02340568-90 - TVT-S IFU
ETH.MESH.02340829-835 - TVT-O IFU - (01.07.04 to 03.04.05)
ETH.MESH.02341203-13 - TVT Abbrevo IFU
ETH.MESH.03259439-40 - 4.24.2009 Gauld email chain re Green Journal
ETH.MESH.03427878-883 - TVT IFU - (11.29.10 to 11.26.14)
ETH.MESH.03458123-38 - TVT Patient Brochure
ETH.MESH.03715978 - Weisberg email re: TVT question.
ETH.MESH.03905472-77 - Email string re-TVT recommendation from Dr. Alex Wang
ETH.MESH.03907468-9 - Second Generation TVT - by Axel Arnaud
ETH.MESH.03910175 - Email string re - Soft Prolene
ETH.MESH.03910418-21 - Email string re-Mini TVT - mesh adjustment
ETH.MESH.03911107-08 - Email string re-TVT complications (an Prof. Hausler)
ETH.MESH.03913357-359 - Axel Arnaud Email 5.31.07 Re TVT TVT-O
ETH.MESH.03916905-13 - Plaintiff's Exhibit 3827
ETH.MESH.03924557-86 - Meshes in Pelvic Floor Repair-Findings from literature review and conversations-interviews with surgeons, June 6, 2000.
ETH.MESH.03930120-123 - Nilsson C. Seven-Year Follow-up of the Tension-Free Vaginal Tape Procedure for Treatment of Urinary Incontinence. Obstet Gynecol 2004; 104(6): 1259-62
ETH.MESH.03932909-911 - Confidential - History of TVT-O
ETH.MESH.03932912 - The History of TVT
ETH.MESH.03941623 - DeLeval Email RE: TVT ABBREVO ALERT - French and English Email and English Translation Certification Plaintiff's Exhibit 3619- Perry
ETH.MESH.04048515-520 - Carl Nilsson KOL Interview Project Scion 06.18.08
ETH.MESH.04081189 - Meeting Agenda
ETH.MESH.04082973 - Possible Complications for Surgeries to Correct POP and SUI
ETH.MESH.04092868 - Email re : 10100080654 and TVT IFUs
ETH.MESH.04938298-299 - Piet Hinoul Email Re: Prof. de Leval - TVT Abbrevo
ETH.MESH.04941016 - Lightweight Mesh Developments (Powerpoint)
ETH.MESH.04945231-239 - Email string re-Ultrapro vs Prolene Soft Mesh
ETH.MESH.04945496 - Bernd Klosterhalfen Email Re: Ultrapro vs. Prolene Soft Mesh April 18, 2005
ETH.MESH.05225380-384 - TVT IFU - (09.08.00 to 11.26.03)
ETH.MESH.05337217-220 - Email string, top one from D. Miller to J. Paradise, et al
ETH.MESH.05347751-762 - Email string re Investigator-initiated studied policy
ETH.MESH.05479411 - The (clinical) argument of lightweight mesh in abdominal surgery
ETH.MESH.05479535
ETH.MESH.05588123-126 - Stephen Wohler Email - AW: How inert is polypropylene? July 9, 2007
ETH.MESH.05644163-171 - Pelvic Floor Repair-Surgeon's Feed-back on Mesh Concept
ETH.MESH.05799233-39 - TVT Exact IFU
ETH.MESH.05918776 - Email re: Marlex Experience

Production Materials

ETH.MESH.05958248 - Surgeons Resource Monograph
ETH.MESH.05998835-836 - Piet Hinoul Email Re: ALERTE TVT ABBREVO
ETH.MESH.06592243 - 09.14.2012 Email from Carl Nilsson to Laura Angelini
ETH.MESH.06695438 - Justification for Utilizing the Elasticity Test as the Elongation Requirements on TVT LCM
ETH.MESH.06887138-40 - Waltregny email written on behalf of Professor de Leval.
ETH.MESH.06887244 - 07.16.04 David Waltregny email to Dan Smith re: TVT-O.
ETH.MESH.06917699-704 - Form For Customer Requirements Specification (CRS) For Project TVT-O PA
ETH.MESH.06923868-71 - TVTO-PA Clinical Strategy - 8.21.13 Exhibit A.M. Mitchell T-2177
ETH.MESH.07192929 - Investigating Mesh Erosion in Pelvic Floor Repair Powerpoint
ETH.MESH.07226579-590 - 2000 - TVT CER
ETH.MESH.07383730-31 - Email string re-Ultrapro mesh information-identical mesh to Prolift +M
ETH.MESH.08003181-96 - TVT Patient Brochure
ETH.MESH.08003231-46 - TVT Patient Brochure
ETH.MESH.08003279-94 - TVT Patient Brochure
ETH.MESH.08003295-302 - TVT Patient Brochure
ETH.MESH.08299913-917 - Nilsson C. Seventeen years' follow-up of the tension-free vaginal tape procedure for female stress urinary incontinence. Int Urogynecol J 2013; 24(8): 1265-9 [9.11.13 Exhibit T-1271]
ETH.MESH.08315779 - Clinical Expert report-09.25.2012
ETH.MESH.08334244; ETH.MESH.08334245 - Email re Photographs of LCM vs MCM with attachments
ETH.MESH.08334244-45 - Email string re-Photographs of LCM vs MCM with powerpoint attachment
ETH.MESH.09264945-46 - Prolene Mesh Re-Design Project
ETH.MESH.09630649 - 4.26.1973 FDA Letter RE: NDA 16-374
ETH.MESH.09656792
ETH.MESH.09656795
ETH.MESH.09744858-63 - TVT Patient Brochure
ETH.MESH.09746948-998 - License and Supply Agreement [Rosenzweig Exhibit 21 - 12.22.15]
ETH.MESH.09747038-097 - Medscand Agreement
ETH.MESH.09747337-369 - Asset Purchase Agreement
ETH.MESH.09888187-223 - Seven Year Data for Ten Year Prolene Study - Plaintiff's Exhibit 4102
ETH.MESH.09922570-578 - R&D Memorandum of PA Mesh Assessments for TVTO-PA Revision 1
ETH.MESH.10281860 - Tension-Free Midurethral Sling: Market Update.
ETH.MESH.11336474-87 - Ten Year In Vivo Suture Study Scanning Electron Microscopy-5 Year Report - Plaintiff's Exhibit 4111
ETH.MESH.12831391-92 - P4128 - IR Microscopy of Explanted Prolene received from Prof. R. Guidoin.
ETH.MESH-08476311 - Cytotoxicity assessment of Ulstem sling
Gynecology Solutions
Johnson & Johnson - Our Credo [8.9.13 A.M. Mitchell Exhibit T-3134]
June, 2009 Klosterhalfen intermediate report on explanted mesh (highlighted)
Klinge Presentation PVDF: a new alternative? Meeting o Hernia Experts Exhibit P-1944
Librojo updated TVT Declaration (10-23-15) [12 pages]
McCabe email re - Sheath Sales Tool - 464
MSDS-Marlex Polypropylenes
P4122 - SEM Figure 183: Sample J7959 13409 (Photographs)
Payments to Medscand [9.16.13 Exhibit T-3192]
Payments to Medscand by J&J [9.16.13 Exhibit T-3183]
Payments to Ulmsten as Consultant [9.16.13 Exhibit T-3204]

Production Materials

Published clinical data and RCTs - Ethicon.com - 4204-C
Seven Year Dog Study - T-2263
TVT Abbrevio IFU - 01.2015
TVT Exact IFU - 01.2015
TVT IFU - 01.2015
TVT Patient Brochure - 2015
TVT-O la bandelette trans-obturatrice (Photograph)
TVT-Obturator IFU - 01.2015

Company Witness Depositions

Deponent [Date of Deposition]
Hinoul, Piet - 04.05.2012 Deposition Testimony
Hinoul, Piet - 09.18.2012 Deposition Testimony
Weisberg, Martin - 05.24.2012 Deposition Testimony
Weisberg, Martin - 8.9.2013 Deposition Testimony
Weisberg, Martin - 11.12.2015 Deposition Testimony
Weisberg, Martin - 11.13.2015 Deposition Testimony
Nager, Charles - 06.10.2014 Deposition Testimony

Other Materials

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FDA - Device Labeling Guidance #G91-1 March 1991
FDA Considerations about Surgical Mesh for SUI [03.27.2013].
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FDA News Release: Surgical Placement of mesh to repair pelvic organ prolapse poses risk [07.13.2011].
FDA Public Health Notification: Serious Complications Associated with Transvaginal Placement of Surigical Mesh in Repair of POP and SUI. Issued: 10.20.2008.
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AUGS SUFU Position Statement on MUS for SUI
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AUA (2011) - Position Statement on the Use of Vaginal Mesh for SUI
FDA Considerations about Surgical Mesh for SUI
IUGA Position Statement on MUS for SUI (2014)
IUGA Mid-urethral sling (MUS) procedures for stress incontinence (2011)
2013 Sept. NICE 171 Guideline - The management of urinary incontinence in women
ICS Fact Sheet 2015
RANZOG and UGSA 2014 Position Statement
2012 ABOG - Guide to Learning in Female Pelvic Medicine and Reconstructive Surgery
AUA National Medical Student Curriculum Urinary Incontinence
AUGS Resident Learning Objectives
ACGME Program Requirements.

Betty McCumber - Case Specific

Depositions
McCumber, Betty - 4.11.2017
Expert Reports
Other
Medical Records
Adena Health Systems - Billing 1-7
Adena Medical Group - Billing 1-9
Adena Regional Medical Center - Pathology 1-2
Adena Regional Medical Center - Radiology 1-1
Adena Regional Medical Center - Radiology 2-2
Adena Urology - Billing 1-7
Adena Urology - Billing 8-16
Adena Urology - Medical 1-5
Adena Urology - Medical 17-17 (cert)
Adena Urology - Medical 6-6 (cert)
Adena Urology - Medical 7-16
Baker Joyce LPC - Medical 1-1 NRS
Centers for Medicare & Medicaid - Insurance NR cert or letter 1-1
Centers for Medicare & Medicaid - Insurance NR cert or letter 2-3
Haller Marla D DO - Medical 1-2 NRS
Holzer Clinic - Medical 1080-1101
Holzer Clinic - Medical 1-256
Holzer Clinic - Medical 251-515
Holzer Clinic - Medical 516-1079
Holzer Medical - Billing 10-14
Holzer Medical - Billing 1-9
Holzer Medical Center - Billing 15-16
Holzer Medical Center - Medical 137-191
Holzer Medical Center - Medical 1-93
Holzer Medical Center - Medical 94-136
Holzer Medical Center - Medical cert 192-192
Holzer Medical Center - Pathology 1-1 NRS
Holzer Medical Center - Radiology 1-24
Holzer Medical Center - Radiology 25-27
Kincaid Stephen Craig Dr - Medical 1-134
Kings Daughters Family Care - Medical 1-31
Kings Daughters Family Care - Medical 132-132
Kings Daughters Family Care - Medical 133-719

Betty McCumber - Case Specific

Kings Daughters Family Care - Medical 32-90
Kings Daughters Family Care - Medical 720-769
Kings Daughters Family Care - Medical 770-844
Kings Daughters Family Care - Medical 91-131
Kings Daughters Family Care Centers - Billing 845-874
Nooranissa J Pasha MD - Medical 1-1 NRS
Ohio Health Heart And Vascular Physicians - Medical 1-1
Ohio Health Physician Group - Billing 1-1
Plaintiff Profile Form 1-5
Plaintiff Profile Form 6-10
Plaintiff Supplied Records - 198-294
Plaintiff Supplied Records 100-197
Plaintiff Supplied Records 1-1
Plaintiff Supplied Records 2-99
Shriver Family Practice - Medical 1-17
Shriver Family Practice - Medical 18-18 CER
Shriver Family Practice - Medical 19-19 CER
Southern Ohio Medical Center - Billing 1-1 NRS
Southern Ohio Medical Center - Medical NR cert or letter 1-1
Southern Ohio Medical Center - Pathology 1-1 NRS
Southern Ohio Medical Center - Radiology 1-1
SSA Retirement and Disability - 1-290
SSA Retirement and Disability - 291-592